



**LOUIS PADNOS IRON & METAL COMPANY**  
Secondary Metals and Fibres

June 18, 2009

Office of the Clerk of the Bankruptcy Court  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, New York 10004-1408

Chapter 11 Case  
Case 09-50026 (REG)

June 18, 2009

To the Office of the Clerk,  
Vito Genna

Louis Padnos Iron & Metal Company objects to the relief sought in the motion. The reason for our objection is that we have been unable to verify the amount that the debtor shows as being due to us. We have tried to verify the amount on record through the Contract Notices website. We have contacted, via phone as instructed, the administrator for Contract Notices and were issued an issue ID (20095230). However at this time we still have not had a response to our inquiry and issue. For this reason we have determined we should file an objection pending a satisfactory answer to our inquiry and verification that the Debtor's records accurately reflect the amount due our company.

Enclosed you will find a report detailing the amounts that were due our company as of the date of the bankruptcy filing. This amount was previously submitted to the Debtors. Please note that we are not certain that our records are in disagreement. Rather, we simply have not been able to find any record showing what the Debtor reports as owing to us.

Also, please note that we did file an agreement stating that we would continue to provide materials and services on pre-petition terms, and in fact we are doing so.

We thank-you for your attention to this matter.

Scott Wolters  
On behalf of

Louis Padnos Iron & Metal Company  
185 West 8<sup>th</sup> Street  
Holland, Michigan 49423  
616-796-7164



**APEX ANALYTIX**  
**FACSIMILE TRANSMITTAL SHEET**

**Date:** 05/28/2009

**To:** Josh

**Company:** Louis Padnos Iron & Metal Eft

**Phone:** 800-442-3509

**Fax:** 616-396-7789

**From:** Frances Reid

**Email:** freid@apexanalytix.com

**Phone:** 336-291-1817

**Fax:** 1-336-217-0844

**Pages:** 1 ( including this page )

**RE:** Claim Number GMCP082010782L

**Urgent** ☐

**For Review** ☐

**Please Comment** ☐

**Please Reply** ☐

**Comments:** Attn: Josh Attached please find request letter for current statement of account or open a/r detailed aging schedule, for all General Motors Corporation locations and divisions. We will appreciate it, if you would please forward this information to us @ your earliest convenience. Thank you in advance for your assistance in expediting this request. Have a great day!

1501 Highwoods Blvd., Suite 200-A, Greensboro, NC 27410-2047

www.apexanalytix.com

800.284.4522



Financial Shared Services

General Motors Corporation  
Disbursement Services

May 28, 2009

**Request for Statement**  
**Please Reply Within 10 Days of Receipt of this Letter**

Louis Padnos Iron & Metal Eft  
Attn: Accounts Receivable Manager  
Co  
Slot 303113  
Chicago, IL 60666-0973 60666-0973

Dear General Motors Company Vendor,

We have solicited the services of APEX Analytix to review our Accounts Payable operation. As part of this service, we are requesting that our vendors furnish their most recent account statement or aging schedule to APEX Analytix. **This schedule should only detail all open (outstanding) invoices and credit memos including all returns, rebates, unapplied cash, overpayments, unused deposits, and pre-payments.** Please provide information such as invoice number, invoice date, and invoice/credit amounts, for all General Motors Company locations.

When forwarding your statement, please include this letter with the completed current contact name, phone, fax and email address listed below. If there is no outstanding activity, please check the box below indicating there is no outstanding activity and return to us. If you have any other associated business names, or if your address has changed, please provide your new address in the physical address line listed below. **(Please do not send a separate cover sheet with statements. This letter will serve as your cover sheet).** Statements can be sent to us by one of the following options listed below:

Faxed to the following number: **1-336-217-0844**

Forwarded to the following address:

**APEX Analytix**  
Attn: General Motors Company Statements  
1501 Highwoods Blvd., Ste. 200-A  
Greensboro, NC 27410-2047

OR

E-mailed to the following:

**freid@apexanalytix.com (Include the barcode id in the subject line)**

- ☐ No Outstanding Activity  
☒ Schedule Attached

Your Name: Josh Dolislager Email Address: josh.dolislager@padnos.com  
Telephone Number: (616) 796-7132 Fax Number: (616) 396-7789  
Physical Address: 185 W. 8th Street, Holland, MI 49423

Your cooperation is greatly appreciated and will help General Motors Company serve you better. If you have any questions regarding this request, please contact Frances Reid at 336-291-1817.

Sincerely,

*Brian D. Albee*



**GMCP082010782L**

Brian D. Albee  
Director  
North America Quality Assurance Team  
GM Global Financial Shared Services

## GM A/R Summary for Louis Padnos Iron & Metal Co.

<u>Account</u>	<u># of Invoices</u>	<u>Amount Due</u>
GEN2400	22	\$ 27,716.72
GEN2600	1	\$ 2,893.05
TRE0600	32	\$ 72,075.27
		<u>\$ 102,685.04</u>

## Accounts

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## Receivable

# of Trans

22

## Transaction Summary

## Aging

Account	Name	Tran Date	Period	Due Date	Trd	Group	Reference	Comment	Orig. Amt	Balance	Age
Tran #	Type					Yard					
GEN2400	GM POWERTRAIN DIVISION					CF					
4568659	DI	04/20/2009	2009/05	05/18/2009	SBP	4	4568659	CSXT 708775	1,242.08	1,242.08	39
4569483	DI	04/29/2009	2009/05	05/27/2009	SBP	4	4569483	CSXT 708422	1,337.43	1,337.43	30
4569889	DI	05/04/2009	2009/05	06/01/2009	SBP	4	4569889	CSXT 706004	1,241.27	1,241.27	25
4569890	DI	05/04/2009	2009/05	06/01/2009	SBP	4	4569890	CSXT 706355	1,288.55	1,288.55	25
4569891	DI	05/04/2009	2009/05	06/01/2009	SBP	4	4569891	CSXT 705680	1,231.66	1,231.66	25
4570021	DI	05/05/2009	2009/05	06/02/2009	SBP	4	4570021	CSXT 708248	1,314.20	1,314.20	24
4570024	DI	05/05/2009	2009/05	06/02/2009	SBP	4	4570024	BO 350783	1,355.87	1,355.87	24
Unposted											
4570252	SHP	05/07/2009	2009/05		SBP	4	4570252	CSXT 705435	1,177.97	1,177.97	0
4570253	SHP	05/07/2009	2009/05		SBP	4	4570253	BO 357035	1,148.32	1,148.32	0
4570254	SHP	05/07/2009	2009/05		SBP	4	4570254	CSXT 707460	1,149.92	1,149.92	0
4570256	SHP	05/07/2009	2009/05		SBP	4	4570256	BO 356826	1,128.29	1,128.29	0
4570257	SHP	05/07/2009	2009/05		SBP	4	4570257	BO 356544	1,117.07	1,117.07	0
4570542	SHP	05/12/2009	2009/05		SBP	4	4570542	CSXT 706785	1,229.25	1,229.25	0
4570546	SHP	05/12/2009	2009/05		SBP	4	4570546	CSXT 709094	1,278.14	1,278.14	0
4570548	SHP	05/12/2009	2009/05		SBP	4	4570548	CSXT 706084	1,238.07	1,238.07	0
4570549	SHP	05/12/2009	2009/05		SBP	4	4570549	CSXT 484230	1,399.14	1,399.14	0
4570550	SHP	05/12/2009	2009/05		SBP	4	4570550	CSXT 485001	1,373.50	1,373.50	0
4570999	SHP	05/15/2009	2009/05		SBP	4	4570999	NYC 588200	1,353.46	1,353.46	0
4571000	SHP	05/15/2009	2009/05		SBP	4	4571000	CSXT 481648	1,263.71	1,263.71	0
4571001	SHP	05/15/2009	2009/05		SBP	4	4571001	BO 350310	1,315.00	1,315.00	0
4571002	SHP	05/15/2009	2009/05		SBP	4	4571002	CSXT 709046	1,355.06	1,355.06	0
4571003	SHP	05/15/2009	2009/05		SBP	4	4571003	CSXT 707099	1,178.77	1,178.77	0
Unposted											
Acct. Total:									Orig. Amt	Balance	Avg
Grand Total:									27,716.72	27,716.72	27
									27,716.72	27,716.72	27

# Aging

# of Trans 1

## Group

Tran #	Type	Tran Date	Period	Due Date	Trd	Yard	Reference	Comment	Orig. Amt	Balance Age
GEN2600	CORPORATE MATERIAL BROKERING									
4570848	DI	05/18/2009	2009/05	06/15/2009	SBP	CI 3	4570848	5822 / 1885	2,893.05	11
			0-30	31-60	61-90	OVER 90	OVER 999		Orig. Amt	Balance
				Acct. Total:	2,893.05	0.00	0.00	2,893.05	2,893.05	11
				Grand Total:	2,893.05	0.00	0.00	2,893.05	2,893.05	11

Accounts

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# Aging

# of Trans

32

## Receivable Transaction Summary

Account	Name	Tran Date	Period	Due Date	Trd	Group	Reference	Comment	Orig. Amt	Balance	Age
Tran #	Type					Yard					
TRE0600 GENERAL MOTORS											
4565420	DI	03/02/2009	2009/03	03/30/2009	SAW	CR	4565420		3,750.00	3,750.00	88
4565421	DI	03/10/2009	2009/03	04/07/2009	SAW		09-GM-9479		3,750.00	3,750.00	80
4565444	DI	03/16/2009	2009/03	04/13/2009	SAW		15380402		3,750.00	3,750.00	74
4566227	DI	03/23/2009	2009/03	04/20/2009	SAW		09-GM-9479		3,750.00	3,750.00	67
4566796	DI	03/02/2009	2009/03	03/30/2009	SAW	5	08-GM-8762		1,500.00	1,500.00	88
4566797	DI	03/09/2009	2009/03	04/06/2009	SAW	5	08-GM-8762		1,500.00	1,500.00	81
4566798	DI	03/16/2009	2009/03	04/13/2009	SAW	5	08-GM-8762		1,500.00	1,500.00	74
4566799	DI	03/23/2009	2009/03	04/20/2009	SAW	5	08-GM-8762		1,500.00	1,500.00	67
4566800	DI	03/30/2009	2009/03	04/27/2009	SAW	5	08-GM-8762		1,500.00	1,500.00	60
4567348	DI	03/30/2009	2009/04	04/27/2009	SAW		09-GM-9479		3,750.00	3,750.00	60
4567349	DI	04/06/2009	2009/04	05/04/2009	SAW		09-GM-9479		3,750.00	3,750.00	53
4568975	DI	04/13/2009	2009/04	05/11/2009	SAW		09-GM-9479		3,750.00	3,750.00	46
4568977	DI	04/20/2009	2009/04	05/18/2009	SAW	5	08-GM-8762		1,500.00	1,500.00	53
4569172	DI	04/06/2009	2009/04	05/04/2009	SAW	5	08-GM-8762		1,500.00	1,500.00	46
4569173	DI	04/13/2009	2009/04	05/11/2009	SAW	5	08-GM-8762		1,500.00	1,500.00	39
4569174	DI	04/20/2009	2009/04	05/18/2009	SAW	5	08-GM-8762		1,500.00	1,500.00	32
4569175	DI	04/27/2009	2009/04	05/25/2009	SAW	5	08-GM-8762		1,500.00	1,500.00	25
4569884	DI	04/27/2009	2009/05	06/01/2009	SAW		09-GM-9479		3,750.00	3,750.00	25
4571338	DI	05/04/2009	2009/05	06/01/2009	SAW	5	08-GM-8762		1,500.00	1,500.00	18
4571339	DI	05/11/2009	2009/05	06/08/2009	SAW	5	08-GM-8762		1,500.00	1,500.00	11
4571340	DI	05/18/2009	2009/05	06/15/2009	SAW	5	08-GM-8762		1,500.00	1,500.00	4
4571341	DI	05/25/2009	2009/05	06/22/2009	SAW		09-GM-9479		3,750.00	3,750.00	18
4571760	DI	05/11/2009	2009/05	06/08/2009	SAW		09-GM-9479		3,750.00	3,750.00	11
4571761	DI	05/18/2009	2009/05	06/15/2009	SAW		09-GM-9479		3,750.00	3,750.00	3
4571762	DI	05/25/2009	2009/05	06/23/2009	SAW		09-GM-9479		3,750.00	3,750.00	3
4571763	DI	05/26/2009	2009/05	06/23/2009	SAW		09-GM-9479		3,000.00	3,000.00	3
Unposted											
5313635		05/21/2009					TRK	047,300	211.16	211.16	0
5313817		05/22/2009					TRK	035,600	158.93	158.93	0
5317498		05/28/2009					TRK	048,500	216.52	216.52	0
5318948		05/29/2009					TRK	019,300	86.16	86.16	0
5305843		05/13/2009					TRK	034,160	152.50	152.50	0
Unposted Totals:									825.27		
Acct. Total:									825.27	72,075.27	44
Grand Total:									825.27	72,075.27	44